BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996

CC Docket No. 98–146

REPLY COMMENTS
of the
GENERAL SERVICES ADMINISTRATION

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Summary

GSA responds to comments on the deployment of advanced telecommunications services, particularly in areas that are more costly to serve. In response to the Commission's request for data on broadband deployment, most carriers offer qualitative assessments or aggregated data. Nevertheless, one conclusion is clear — although opportunities for access to advanced services are expanding significantly, deployment levels vary widely between urban and rural areas.

To ensure deployment of services to all consumers, the Commission should focus on steps to promote maximum competition for the "last mile" of access to the backbone network. Indeed, comments by end users and competitive carriers demonstrate that the most critical bottleneck may be facilities for the last several hundred feet. These commenters explain that competitors need access to house and riser cable installed or controlled by the incumbent carrier in multi–tenant buildings in order to give business and residential consumers opportunities to obtain advanced services from alternative telecommunications providers.

In their comments, incumbent carriers seek greater pricing flexibility to facilitate their participation in advanced services markets. However, GSA explains that excessive access changes and inefficient access rate structures are barriers to the deployment of advanced services. Thus, on balance, reductions in regulatory surveillance over incumbent carriers would be counterproductive.

Finally, GSA rebuts contentions by incumbent carriers that the Commission should soften the requirements for them to share telecommunications infrastructure with competitive carriers. GSA explains that sharing is necessary so that competitors who lack the corresponding infrastructure can provide services to their own end users. Thus, GSA concurs with carriers who urge the Commission to adopt policies that will maximize access to incumbents' operations support systems ("OSS"), increase unbundling, facilitate collocation, and meet other objectives critical for increased competition in the provision of broadband services.

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The General Services Administration ("GSA") submits these Reply Comments on behalf of the customer interests of all Federal Executive Agencies ("FEAs") on the Notice of Inquiry ("Notice") released on February 18, 2000. The Notice seeks deployment data, as well as comments and replies on steps that the Commission should take to accelerate the deployment of advanced telecommunications capabilities to all Americans.

I. INTRODUCTION

The Telecommunications Act of 1996 requires the Commission to assess the availability of advanced or broadband telecommunications services and take steps to ensure that these services are available throughout the nation on a reasonable and

timely basis.[1] To hasten deployment of broadband telecommunications capabilities, the legislation directs the Commission to remove barriers to infrastructure investment and promote competition in all telecommunications markets.[2] The Notice is an important step in this continuing process.

In August 1998, the Commission initiated this proceeding by a Notice of Inquiry seeking data on the deployment of broadband services.[3] GSA submitted Comments and Reply Comments in response to that Notice of Inquiry.[4] In those submissions, GSA described the FEAs' end–user interests in issues concerning broadband services. GSA also urged the Commission to take steps to help foster full and open competition for all telecommunications services.

The Commission concluded the 1998 inquiry with its *First Report*, which contained conclusions on the deployment of advanced services, and acknowledged the need to continue monitoring deployment levels through reports by carriers and a subsequent investigation.[5] Through the proceeding established in the instant Notice, the Commission continues the process of obtaining timely data on deployment, particularly for rural and inner city areas that may be more costly or difficult to serve.[6]

GSA submitted Comments in response to the Notice. In those Comments, GSA explained that advanced telecommunications services have extensive network requirements, and transit the "last mile" to homes and businesses using significantly

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1 Telecommunications Act of 1996, Pub. L. No. 104–104, 110 Stat. 56, codified at 47 U.S.C. § 151 *et seq.* ("Telecommunications Act").

2 *Id.*, Sect. 706(b).

3 *Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, CC Docket No. 98–146, Notice of Inquiry released August 8, 1998.

4 Comments of GSA, September 14, 1998; and Reply Comments of GSA, October 8, 1998.

5 Report of the Commission 14 FCC Rcd 2398 (1999) ("*First Report*"), at 2402.

6 Notice, paras. 2–7.

upgraded transmission technologies, so that ubiquitous access to high bandwidth services cannot be expected immediately. In the meantime, it is vital that the Commission take steps to remove barriers to competition for narrow band and wideband services.

More than 40 additional parties submitted comments in response to the Notice. These parties include:

- 11 incumbent local exchange carriers ("LECs") and associations of these carriers;
- 9 competitive LECs and interexchange carriers ("IXCs");
- 5 Internet service providers;
- 15 additional firms and organizations with diverse interests in communications, ranging from equipment manufacturing to provision of satellite transmission capabilities;
- a U.S. commonwealth government; and
- 4 groups of end users of advanced services.

In these Reply Comments, GSA responds to the positions advanced by these parties.

II. CONTRARY TO CLAIMS BY SOME CARRIERS, THE COMMISSION SHOULD TAKE PRO-COMPETITIVE STEPS TO EXPEDITE DEPLOYMENT OF BROADBAND SERVICES.

A. Capabilities for broadband access are expanding, but deployment levels vary widely between urban and rural areas.

Comments show that in the two years since the Commission released its *First Report*, many segments of the telecommunications industry have significantly increased their investments in advanced telecommunications capabilities. Incumbent and competitive LECs, cable networks, Digital Subscriber Line ("DSL") providers, satellite operators, wireless service providers, and other firms are now making

investments that employ a variety of creative business approaches.[7] For example, BellSouth states that Asynchronous DSL ("ADSL") service is now available in about thirty of the company's markets.[8] ADSL services are now available for seven million of the company's lines. Availability should be extended to 11 million lines by the end of the current year.[9]

In addition, the Association for Local Telecommunications Services ("ALTS") reports that competitive LECs have invested more than 56 percent of their total revenue — $2.4 billion in 1998 and $9.4 billion in 1999 — in new networks.[10] ALTS states that much of this investment has been designated for facilities to provide advanced services.[11] Moreover, ALTS reports that one specific result of this effort is that competitive LECs provide more than 20 percent of the 500,000 DSL lines in use throughout the nation today.[12]

From another perspective — that of a cable network — MediaOne reports that it is now deploying modems to make a full range of broadband services available in a number of communities in California, Florida, Georgia, Minnesota, Virginia and other states.[13] Generally, deployments by MediaOne are concentrated in urban areas. For example, this carrier plans to complete deployment of cable modem service to the entire Los Angeles service area by year–end 2000.[14] Moreover, the company reports

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7 Comments of AT&T Corp. ("AT&T"), p. 2.

8 Comments of BellSouth, p. 2.

9 *Id.*, pp. 2–3.

10 Comments of ALTS, pp. 4–5.

11 *Id.*, p. 5.

12 *Id.*, p. 3.

13 Comments of MediaOne Group ("MediaOne"), pp. 1–2.

14 *Id.*, p. 7.

that 62 percent of Hispanic households and 51 percent of African American households in that area are capable of receiving cable modem services today.[15]

Although several parties provide fairly detailed data, most carriers offer only qualitative assessments or aggregated data on broadband deployment. Moreover, the reporting is *ad hoc*, and generally highlights "success stories." Carriers contend that they will provide more data in the indefinite future. For example, U S WEST states:

> U S WEST supports the Commission's effort to gather data on the so–called "digital divide," but U S WEST has not yet updated the data previously submitted to the Commission on this issue.[16]

Although data is lacking, U S WEST acknowledges that "without a doubt, advanced telecommunications capability is not currently being deployed to all Americans."[17]

In this proceeding and others, GSA has emphasized the need for more "hard data" on the deployment of advanced telecommunications services. For example, GSA explained that it will be necessary to have access to data held by telecommunications carriers and Internet service providers in order to address the substantive issues identified in the Notice for this proceeding.[18] Also, in Comments submitted in CC Docket No. 99–301 last year, GSA strongly urged the Commission to establish a comprehensive data collection program encompassing wireline, wireless and broadband services.[19] Comments submitted in response to the Notice bear out the continuing requirement for data on broadband deployment.

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15 *Id.*

16 Comments of U S WEST, p. 2

17 *Id.* (emphasis in original.)

18 Comments of GSA, p. 3.

19 *In the Matter of Local Competition and Broadband Reporting*, CC Docket No. 99–301, Comments of GSA, December 3, 1999, pp. 3–9.

B. Ubiquitous access requires emphasis on implementing new technologies for the "last mile."

Although data on advanced services deployment is fragmentary, it is clear that the explosive growth in the backbone network has not been matched in the "last mile," the link connecting the residential and business customer to the network. The Commission explained that no matter how fast the backbone network, if the last mile to the consumer is slow, the consumer cannot take advantage of the network's capabilities.[20] Moreover, elimination of the "last mile" bottleneck, particularly outside of metropolitan areas where unit costs of service are much greater, will not be accomplished easily.

In Appendix B to the Notice, the Commission presented a chart showing time–phased deployment of major electronics technologies introduced since 1876. As GSA explained in its Comments, a primary conclusion to be drawn from this data is that technologies requiring extensive landline distribution networks –– telephone, electricity, and cable — took substantially longer periods of time to achieve sizable market penetrations.[21]

Comments of the Public Utility Law Project ("PULP") reach a conclusion similar to that articulated by GSA. PULP notes that landline distribution networks providing the "last mile" of connectivity to consumers are the principal factor setting the implementation schedule.[22]

Local distribution networks for broadband services employ some of the same facilities required for basic services. However, GSA explained that it is important to

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20 *First Report*, para. 13.

21 Comments of GSA, p. 5.

22 Comments of PULP, pp. 8–9.

note that advanced services have their own unique requirements.[23] Broadband services transit the last mile to homes and businesses using significantly upgraded forms of the transmission technologies — wire and coax — employed for conventional telephone and cable television distribution systems. However, modifications are required in the distribution networks — basically adding the capabilities for digital subscriber line ("DSL") to the wireline network and converting the cable television distribution system to two-way operation — in order to provide the transmission capabilities required for broadband telecommunications services.[24]

The National Exchange Carrier Association ("NECA) explains that the requirements for conversion to broadband are particularly extensive in rural areas. NECA explains:

> Local networks, built to handle voice frequencies, usually must be upgraded to handle data transmissions in loops beyond 18 kilofeet (approximately three miles) from a central office. Devices such as repeaters, load coils, and line concentrators, designed to improve voice transmission over long loop lengths, actually impede data transmission.[25]

NECA notes that, as a consequence, the costs to condition loops can be high, and cost recovery especially difficult, because of the relatively small potential subscriber base.[26]

Several parties explain that satellite–based services offer significant promise in reducing the costs — and hence accelerating the schedule — for deployment of advanced services in less densely populated regions.[27] However, general

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23 *Id.*, pp. 5–6.

24 *Id.*, p. 6.

25 Comments of NECA, pp. 6–7 (emphasis in original.)

26 *Id.*, p. 7.

27 Comments of SkyBridge LLC ("SkyBridge"), pp. 1-8; and Comments of Hughes Network Systems ("Hughes"), pp. 4–7.

implementation of satellite technology seems to be targeted to the 2002–2003 period.[28] While implementation of terrestrial and satellite approaches continues, comments demonstrate the need for the Commission to continue significant levels of regulatory surveillance so that all carriers have equal opportunities to participate in the provision of advanced telecommunications services.

III. END USERS DEMONSTRATE THE NEED FOR COMPETITORS TO EMPLOY FACILITIES ORIGINALLY PLACED BY INCUMBENT CARRIERS IN MULTI–UNIT BUILDINGS.

To ensure deployment of advanced services to all consumers, the Commission must focus on steps to promote maximum competition for the "last mile" of access to the backbone network. Indeed, comments by end users and competitive carriers demonstrate that the most critical bottleneck may be facilities for the last several hundred feet. Although interconnection and access are perhaps most often considered in the context of facilities at central offices or manhole locations, the threats to competition in some cases concern cable inside office and apartment buildings owned by non–telephone company entities.

In its comments, ALTS explains the need for access to house and riser cable in multi–tenant buildings in order to give business and residential consumers in those buildings the ability to obtain advanced services from alternative telecommunications providers.[29] ALTS states:

> [u]ntil competitive LECs are able to access multi–tenant buildings under the same conditions as the incumbent LECs access those buildings, competition will be stalled. Once competitive LECs have nondiscriminatory access to those buildings, tenants will have true

28 Comments of SkyBridge, p. 2; and Comments of Hughes, pp. 1-5.

29 Comments of ALTS, p. 2.

> competitive choice of carriers for both local and advanced services.[30]

To achieve these goals, ALTS urges the Commission to ensure that all incumbent LECs comply with the market–opening provisions of the Telecommunications Act.[31]

GSA has first–hand experience with this issue from an end user's perspective. In many cities, Federal offices are grouped in multi–floor buildings and served as individual tenants, perhaps by a Centrex system. At some locations of this type, provision of telecommunications services by competitive carriers has been delayed or made more costly because competitive carriers could not get nondiscriminatory access to inside wiring effectively controlled by the incumbent LEC.

This bottleneck situation, which potentially affects multi–unit residential buildings as well, impairs competition. To help ensure that users in multi–tenant buildings obtain all the benefits of competition for conventional and advanced services, GSA urges the Commission to adopt standards governing access to house and riser cable throughout the nation.

IV. THE COMMISSION SHOULD NOT HEED REQUESTS TO REDUCE REGULATORY SURVEILLANCE OF INCUMBENT CARRIERS PROVIDING ADVANCED SERVICES.

A. Carriers seek greater pricing flexibility and also suggest direct subsidies for advanced offerings.

Although actions by the Commission are necessary to expedite deployment, several incumbent carriers suggest steps that will delay achievement of this goal. For example, BellSouth contends that an incumbent LEC is handicapped in deploying advanced services by pricing, tariffing and other regulatory requirements, in addition to

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30 *Id.*

31 *Id.*, p. 3.

restrictions that bar them from providing services across LATA boundaries.[32] To achieve a level playing field, BellSouth would have the Commission eliminate or ameliorate requirements on incumbent LECs concerning (1) pricing of services; (2) filing tariffs containing rates, terms and conditions for services; (3) unbundling their networks for competitors; (4) collocation at LEC central offices; and (5) access to LEC loop facilities on a shared basis.[33]

Similarly, the Organization for the Promotion and Advancement of Small Telecommunications Companies ("OPASTCO") urges the Commission to provide smaller LECs with much more pricing flexibility. In its comments, OPASTCO states that the Commission should increase the authorized return for carriers under rate of return regulation because greater earnings would enhance carriers' abilities to undertake broadband deployment.[34]

Citizens Utilities proposes an extensive "subsidy program" to expedite deployment of advanced telecommunications services.[35] According to this firm, advanced telecommunications services should be "directly subsidized by taxpayers in the same way that railroads and the interstate highways were subsidized.[36] Citizens asserts that this approach is justified because "the public ought to pay directly, in the form of taxes, for benefits it determines should be provided by the government."[37] However, Citizens acknowledges that its proposed program, which would also encompass electric, satellite and radio companies providing advanced

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32 Comments of BellSouth, p. 5.

33 *Id.*, p. 6.

34 Comments of OPASTCO, p. 8.

35 Comments of Citizens Utilities ("Citizens"), p. 4.

36 *Id.*, p. 13.

37 *Id.*, p. 4.

telecommunications services, would require Congress to pass implementing legislation.[38] Thus, at the present time, the Commission could not have a decisional role in this approach.

Another end user, the American Library Association, observes that there are a variety of Federal and state systems for regulation for telecommunications, so that proposals to change these systems due to convergence of technologies and industries may ultimately be warranted.[39] However, the Association continues, "any and all models should include elements of the current law that require the preservation of the public interest."[40]

B. Commenters demonstrate that significant reductions in surveillance would be counterproductive.

End users and competitive carriers explain that increased regulatory flexibility for incumbent carriers is likely to be counterproductive in increasing deployment of advanced telecommunications services. For example, GSA noted that the continuing pattern of high earnings by incumbent LECs is correlated with excessive interstate access charges that reduce opportunities for competition.[41]

High access charges impede competition because carriers seeking to provide message toll services in competition with the incumbent LEC must pay these charges to originate or terminate messages on subscriber lines provided by that LEC. In one jurisdiction, competitive carriers reported that the incumbent LEC maintained such a small margin between its access charges and its own message toll charges (a few

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38 *Id.*, p. 9.

39 Comments of the American Library Association, p. 12.

40 *Id.* (emphasis supplied.)

41 Comments of GSA, p. 9.

tenths of a cent) that other carriers could not provide their own intraLATA services on a profitable basis.[42]

Conventional and advanced services share many elements of plant, as well as overhead resources. Because of this synergism, rate levels that prevent additional firms from entering the market to provide conventional services also impair the deployment of advanced telecommunications services at the same places.

In addition to their overall level, the structure of access charges employed to recover interstate non–traffic sensitive revenue requirements is also significant. As GSA has noted in Comments in the *Access Charge Reform* proceeding, both interstate Subscriber Line Charges ("SLCs") and Presubscribed Interexchange Carrier Charges ("PICCs") are disproportionately large for business subscribers, particularly users of multi–line business services.[43] In its Comments in the current proceeding, GSA explained that access charge structures that obtain a disproportionately large share of revenue from business subscribers impair deployment of advanced telecommunications services.[44] Specifically, an access charge system with unbalanced charges for business users discourages competition in providing local exchange services and advanced telecommunications services to subscribers outside of core business areas.

In its comments addressing means to extend broadband capabilities, ALTS explains that competitive carriers may initially target business customers to ensure that entry into a market can be accomplished as quickly as possible.[45] After establishing

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42 *Id.*

43 *In the Matter of Access Charge Reform*, CC Docket No. 96–262, Comments of GSA, December 3, 1999, pp. 5–7.

44 Comments of GSA, pp. 9–10.

45 Comments of ALTS, p. 6.

economic feasibility, a carrier will expand its offering to residential customers.[46] Deployment to business consumers is an effective catalyst in making advanced services available for all users. Therefore, by aligning access charge structures with costs, the Commission can improve opportunities for uniform deployment of advanced services throughout the nation.

V. COMPETITIVE CARRIERS EXPLAIN THAT STEPS TO PROMOTE SHARING OF THE TELECOMMUNICATIONS INFRASTRUCTURE WOULD FOSTER DEPLOYMENT OF BROADBAND SERVICES.

Incumbent carriers contend that the Telecommunications Act and the Commission's implementing regulations pose a barrier to the deployment of advanced telecommunications capabilities. For example, the United States Telecom Association ("USTA") asserts that "onerous Federal and state regulations" cause consumers to suffer the consequences of less competition and place the development of a nationwide commercial marketplace powered by advanced technologies at risk.[47]

Moreover, GTE specifically asserts that the Telecommunications Act — intended to foster competition for all services and especially broadband offerings — actually creates a barrier to market entry because Regional Bell Operating Companies ("RBOCs") must meet the requirements of the competitive checklist before providing services across LATA boundaries.[48] According to GTE, this restriction limits market entry because facilities that RBOCs might construct if they had interLATA operating authority are not available for lease to new entrants.[49]

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46 *Id.*

47 Comments of USTA, p. 2.

48 Comments of GTE, pp. 11–12.

49 *Id.*

In GSA's view, requests to eliminate or reduce the requirements for incumbents to share telecommunications infrastructure seek to "put the cart before the horse." As GSA explained, provisions of the statute and implementing regulations dealing with all aspects of carrier interconnections are a fundamental necessity so that competitors who lack the corresponding local infrastructure can provide services to their own subscribers.[50]

Internet service providers ("ISPs") also demonstrate the need for continued surveillance by the Commission. For example, the Commercial Internet Exchange Association ("CIX") states that "as long as ISPs and end users lack real alternatives to the incumbent carriers' networks, the Commission should ensure that these carriers do not use their market position to narrow consumer choice."[51]

In its Comments, GSA stressed the need for competitive LECs to have efficient access to the incumbents' operations support systems ("OSS").[52] Indeed, this access is one of the Section 271 checklist items that must be satisfied before an RBOC can be authorized to provide interLATA services in its service area.[53]

Comments by a competitive LEC focus on the requirements for access to OSS. Prism describes the difficulties it has experienced in implementing operational interfaces with an incumbent carrier in New York state.[54] As a result of this experience, Prism concludes:

> [t]he best ways for the Commission to promote the expansion of the deployment of advanced services is to ensure that the incumbent LECs meet their obligations under the Telecommunications Act and

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50 Comments of GSA, p. 10.

51 Comments of CIX, p. 2.

52 Comments of GSA, pp. 10–11.

53 Telecommunications Act, Sect. 272 (c)(2)(B)(vi).

54 Comments of Prism Communication Services ("Prism"), pp. 3–4.

> to prevent the incumbents from taking actions that limit the ability of competing carriers to offer advanced services.[55]

GSA concurs with these conclusions by Prism.

Other competitive LECs offer additional recommendations concerning operational interfaces that can present barriers to the deployment of advanced services. For example, WorldCom explains that line sharing offers the potential of promoting competition to provide advanced services using the facilities of competitive LECs.[56] WorldCom notes, "Without line sharing, competition in the local market will be irreparably harmed because only the incumbent LECs will be able to offer a bundled voice and data product."[57] To meet this requirement, WorldCom urges the Commission to require incumbent carriers to carry out certain functions, including making necessary cross–connections and performing troubleshooting functions between the loop leased by the competitive LEC and the competitive LECs' equipment in the incumbent's central office.[58]

AT&T makes a similar point concerning line sharing, and also urges the Commission to take additional steps to improve operational interfaces with incumbent carriers.[59] For example, AT&T states that the Commission should act to prevent incumbent LECs from imposing burdensome terms and conditions on the delivery of data services. AT&T also requests the Commission to take steps to ensure that its order in the *Unbundled Network Element Remand* proceeding prevents incumbent

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55 *Id.*, p. 3.

56 Comments of MCI WorldCom ("WorldCom"), p. 7.

57 *Id.*

58 *Id.*

59 Comments of AT&T Corp. ("AT&T"), pp. 39–41.

LECs from delaying or burdening the availability of combinations of elements that are necessary for competitive LECs to provide advanced services to end users.[60]

Jato, a high–speed Internet access and applications provider, offers additional recommendations. This provider urges the Commission to:

- mandate procedures to expedite provisioning of collocation requests by creating pre–fabricated, standardized cageless collocation arrangements, priced on a per–shelf basis;
- require incumbent LECs to treat requests to extend existing collocation space according to expedited procedures;
- conduct a thorough review of the incumbent LECs' loop conditioning practices; and
- adopt procedures to encourage and monitor the deployment of advanced services in rural and underserved areas by independent LECs.[61]

In each case, Jato explains how the action will help to increase competition for services to end users. GSA concurs with Jato that these steps are worthwhile additional measures to help more firms participate in the provision of services in all markets. This competition is the best approach to foster widespread access to advanced services throughout the nation.

60 *Id.*, pp. 42–43.

61 Comments of Jato Communications ("Jato"), pp. 12–14.

VI. CONCLUSION

As a major user of telecommunications services, GSA urges the Commission to implement the recommendations set forth in these Reply Comments.

Respectfully submitted,

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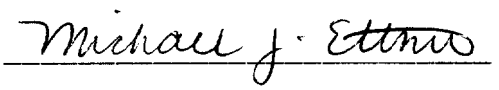

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I, MICHAEL J. ETTNER, do hereby certify that copies of the foregoing "Reply Comments of the General Services Administration" were served this 4th day of April, 2000, by hand delivery or postage paid to the following parties.

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